

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

TAMMY ALLEN, PERSONAL REPRESENTATIVE )  
OF THE ESTATE OF NORMAN ALLEN, )  
Plaintiff, )  
 ) Case No. 1:05-cv-11463  
V. )  
 )  
THE UNITED STATES OF AMERICA, )  
Defendant. )

**PLAINTIFF'S INITIAL DISCOVERY DISCLOSURE**  
**PURSUANT TO FRCP 26, LOCAL RULE 16 AND 26**

Now comes the plaintiff, Tammy Allen, personal representative of the Estate of Norman Allen, and pursuant to FRCP 26, Local Rule 16 and 26, makes the following initial discovery disclosures regarding the diagnosis, care, or treatment of Norman Allen.

Pursuant to FRCP 26(a)(1)(A), the plaintiff identifies the following individuals as likely having discoverable information regarding the care and treatment of Norman Allen.

1. **Ruth Allen**  
818 Ohio Street, Apt. 20  
Bangor, ME 04401
2. **Tammy Allen**  
4 Eyssi Drive  
Salem, NH 03079
3. **Steven Allen**  
16 Concannon Road  
Kingston, NH 03848
4. **Michael Kelly, M.D.**  
308 Main Street  
PO Box 1748  
Lakeville, CO 06039
5. **David Farzan, M.D.**  
Pentucket Medical Associates  
1 Parkway  
Haverhill, MA



6. **Thomas Fazio, M.D.**  
Pentucket Medical Associates  
1 Parkway  
Haverhill, MA
7. **Liam Hurley**  
Northeast Urologic Surgery, P.C.  
198 Massachusetts Avenue  
North Andover, MA
8. **Howard P. Taylor, M.D.**  
254 Pleasant Street  
Methuen, MA 01844
9. **Julie Steckbeck, R.N.**  
Seacoast Hospice  
1039 Islington Street  
Portsmouth, NH 03801
10. Any and all medical providers at **Lawrence General Hospital**, 1  
General Street, PO Box 189, Lawrence, MA 01842-0389, including but  
not limited to:  
  
Thomas L. Fazio, M.A.  
David Farzan, M.D.  
Jonathan Mandell, M.D.  
Liam Hurley, M.D.  
Pedro Sanz-Altamira, M.D.  
John Keefe, M.D.  
Michael Giorgetti, M.D.  
Jane Williamsville, M.D.  
Liam Hurley, M.D.  
Cheryl Ennis, M.D.  
Astrid Peterson, M.D.  
Santos Shetty, M.D.  
George Kwass, M.D.
11. Any and all medical providers at **Andover Surgical Associates, Inc.**,  
140 Haverhill Street, Andover, MA 01810, including but not limited to:  
  
Jonathan Mandell, M.D.  
G. Walker, M.D.



12. Any and all medical providers at **Holy Family Hospital and Medical Center**, 70 East Street, Methuen, MA 01844, including but not limited to:  
  
Pedro Sanz, M.D.  
Liam Hurley, M.D.  
Stephen Zappala, M.D.  
G. Belzarini, R.N.  
Astrid Peterson, M.D.
13. Any and all medical providers at **Merrimack Imaging**, 203 Turnpike Street, North Andover, MA 01845, including but not limited to:  
  
Mark Belkin, M.D.  
Walther Weylman, M.D.
14. Any and all medical providers at **Boston University Medical Group**, Rheumatology Section, 720 Harrison Avenue, Boston, MA 02118, including but not limited to:  
  
Robert Simms, M.D.  
Howard Donough, M.D.  
John Carey, M.D.

Pursuant to FRCP 26(a)(1)(B), the plaintiff has already provided the complete medical and office records from each of the following health care providers in her Rule 35.1 Disclosure of Medical Records.

1. Medical records from Greater Lawrence Family Health Center, including office notes and records of Michael Kelly, M.D.
2. Medical records from Lawrence General Hospital, including oncology reports and notes from Thomas Fazio, M.D. and David Farzan, M.D.
3. Medical records, including office notes, laboratory results, and radiology reports, from Pentucket Medical Associates.
4. Medical records and office notes from Andover Surgical Associates, Inc.
5. Medical records, including radiology and oncology reports, from Holy Family Hospital and Medical Center.
6. Medical records from Merrimack Imaging.
7. Medical records from Northeast Urologic Surgery, P.C.



8. Medical records, including notes, from Boston University Medical Group.
9. Medical records from Howard P. Taylor, M.D.
10. Medical records from Seacoast Hospice.

Pursuant to FRCP 26(a)(1)(C), the plaintiff is currently in the process of collecting and assessing the appropriate medical bills and will disclose an itemization of medical expenses as soon as they are received. Further answering, a computation of damages can be determined by an economist.

Respectfully submitted,  
The plaintiff,  
By her attorney,

/s/ William J. Thompson  
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